

VIA E-MAIL ([The.Secretary@hq.doe.gov](mailto:The.Secretary@hq.doe.gov))

April 27, 2023

The Honorable Jennifer M. Granholm  
Secretary, U.S. Department of Energy  
1000 Independence Avenue, S.W.  
Washington, D.C. 20585

RE: DOE “Savings Hub” Website and Public Education Campaign

Dear Secretary Granholm:

Our trade associations represent the manufacturers and contractors that make up America’s building insulation industry. We strongly support the investments made in building energy efficiency through the Inflation Reduction Act (“IRA”) and Infrastructure Investment and Jobs Act (“IIJA”). We have met on numerous occasions with Department of Energy (“DOE”) leadership to discuss the marketing and education work needed to make these investments successful. While we are encouraged that DOE is undertaking a public education effort through the launch of the “Savings Hub” website, we remain deeply concerned that too little is being done to focus on building envelope improvements and the available incentives. Indeed, the reader must delve deep into the “Savings Hub” website to learn that a robust tax credit is available for insulation and air sealing upgrades. Moreover, they will find no mention of the ability of homeowners to take the 25C tax credit for both insulation improvements and qualifying heat pump upgrades in the same year.

The primary purpose of insulation and air sealing products is to reduce building energy use for the life of the building without the need for replacement. They are American-made products that are readily available and easily installed. Basic air sealing and insulation upgrades to existing homes often result in energy savings of 10-45 percent, depending on the climate zone. These upgrades can translate into substantial homeowner savings and meaningful climate reductions. Yet despite these benefits, prompting homeowners to invest in insulation and air sealing can be difficult.

Insulation is not driven by the “break and replace” cycle that characterizes heating and cooling system replacement. Yet insulation and air sealing are critically important in ensuring proper heating and cooling system operations. We recognize DOE’s focus on achieving building decarbonization through electrification measures like heat pumps. A well-insulated home helps ensure that it is truly “heat pump ready.” Otherwise, installing a heat pump in a poorly insulated home could expose the occupant to dramatically increased heating and cooling costs. Such an outcome worsens the energy burden already shouldered by low- and moderate-income households. Additionally, improving envelope efficiency sometime after new heat pump installation can result in an oversized HVAC system, reducing its projected efficiency and adversely affecting occupant comfort. It is important that envelope efficiency and heat pump replacement are coordinated activities installed at the same time.

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It is our hope that the Department of Energy will act consistent with President Biden's determination under the Defense Production Act (Presidential Determination No. 2022-16) that insulation is a critical material needed to meet our nation's climate goals and undertake significant market education activities specifically around the importance of building envelope improvements. Such activities could include:

- DOE website enhancement prominently featuring the benefits of insulation and the incentives available to homeowners under current legislation.
- Collateral educating consumers on projected savings available when undertaking multiple measure efficiency improvements under the forthcoming electrification and whole home retrofit rebate programs.
- A dedicated helpline to assist the public in maximizing the multiple incentives that may be available to them to improve home energy efficiency.
- Demonstration projects proving the performance benefits of combining heat pump replacements with insulation and air sealing upgrades.
- Consumer calculators projecting home occupant cost savings that result from insulation and air sealing improvements on their own and in conjunction with other measures.

The insulation industry stands ready to work with DOE to see that the IRA and IIJA investments in building energy efficiency are broadly adopted by the public and deliver deep carbon emission reductions. Educational initiatives like those suggested above would put us on that path.

Sincerely,

North American Insulation Manufacturers Association  
Insulation Contractors Association of America  
Cellulose Insulation Manufacturers Association  
EPS Industry Alliance  
Polyisocyanurate Insulation Manufacturers Association  
American Chemistry Council  
Spray Polyurethane Foam Alliance